REMARKS

In the Office Action dated November 17, 2005, claims 1, 2, 5, 7, 9-12, 15-16, 20-25, 28-31, 36, 38, 39, 42, and 51-54 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 5,594,732 (Bell); claim 3 was rejected under § 103 over Bell in view of U.S. Patent No. 6,118,864 (Chang); claim 4 was rejected under § 103 over Bell in view of U.S. Patent No. 5,136,585 (Nizamuddin); claims 6, 17, 18, 37, 41, and 43-45 were rejected under § 103 over Bell in view of U.S. Patent No. 6,078,582 (Curry); claims 13, 26, and 48 were rejected under § 103 over Bell in view of U.S. Patent No. 6,275,573 (Naor); claims 14 and 27 were rejected under § 103 over Bell in view of U.S. Patent No. 6,438,124 (Wilkes); and claims 35 and 40 were rejected under 35 U.S.C. § 103 over Bell in view of U.S. Patent No. 6,389,010 (Kubler).

Claim 1 was rejected as being anticipated by Bell. The Office Action cited the multimedia hub 120 (depicted in Fig. 1 of Bell) as being the controller of claim 1, which controller of claim 1 receives *stimulus control information* according to a *stimulus language* from the digital interface and to encapsulate the *stimulus control information* into one or more packets for transmission over the packet-based network through the packet interface. Specifically, the Office Action cited column 8, lines 44-64, of Bell, which states that the system has an encapsulation circuit capable of receiving a "private network signalling message" from the transmitting user station, and encapsulating the signaling message within. The Office Action equated the "private network signalling message" described in Bell with the stimulus control information recited in claim 1.

It is respectfully submitted that the "private network signalling message" of Bell does *not* constitute the stimulus control information recited in claim 1. As described by Bell, the multimedia hub 120 has an encapsulated D-channel over IP bridge. Bell, 13:52-53. The D-channel is an ISDN (Integrated Services Digital Network) data channel that is used for signaling and control. In fact, the Office Action equated element 150 of Fig. 1 of Bell as being the digital interface recited in claim 1. This element 150 is an ISDN BRI hub (Bell, 14:9). As further explained by Bell, signaling functions are "accomplished over the D-channel ...." Bell, 15:4-7. As further stated by Bell, a bridge is provided for communicating an isochronous signaling frame, from the D-channel, over a packet network. Bell, 15:23-27. Thus, the encapsulation performed by the multimedia hub 120 of Bell is the encapsulation of an ISDN message, also referred to as the "private network signalling message." In Bell, this private

network signaling message is a Q.921 frame Q.931 signaling message. Bell, 17:4-7. As is well known by persons of ordinary skill in the art, Q.921 refers to the layer 2 specification for D-channel, and Q.931 refers to the layer 3 user network interface specifications that are part of the ISDN standards. *See, e.g.*, Ray Horak, "Communications Systems & Networks," Second Edition, p. 270 (attached). As further recognized by persons of ordinary skill in the art, ISDN is a functional message, not a stimulus message. *See, e.g.*, U.S. Patent No. 6,549,621, 3:51-52 (submitted with the Information Disclosure Statement mailed May 13, 2004). It is well known that functional messaging is different from stimulus messaging. *See, e.g.*, U.S. Patent 6,549,621, 3:40-43 ("Generally, there are two types of call control messaging, which will be referred to as stimulus messaging and functional messaging, respectively"); U.S. Patent No. 6,470,020 (cited in Information Disclosure Statement of May 13, 2004), 1:13-65 (describing the differences between a stimulus signaling protocol and a message protocol).

Therefore, the encapsulation of the "private network signalling message" performed in Bell is not the same as encapsulating stimulus control information as recited in claim 1. In view of the foregoing, it is clear that claim 1 is not anticipated by Bell.

Independent claims 20, 28, 30, 39, and 42 are also not anticipated by Bell for similar reasons.

Moreover, with respect to claim 39, the Office Action incorrectly stated that the passage at column 12, lines 1-27, of Bell discloses the subject matter in the last clause of claim 39. In claim 39, the controller is able to determine from a UDP port number whether the corresponding inbound packet contains voice data or stimulus control information. Although the cited passage of Bell makes reference to using source and destination ports to direct a frame through a network, there is no teaching in Bell of using a UDP port to determine whether an inbound packet contains voice data or stimulus control information. This is thus an additional basis for allowability of claim 39 over Bell.

Independent claim 42 is also further similarly allowable over Bell.

Independent claim 13 was rejected as being obvious over Bell and Naor. However, the rejection of claim 13 over Bell and Naor is premised on incorrectly equating "private network signalling message" as described in Bell with stimulus control information as recited in claim 13. Based on this defective application of the claim language to the teachings of Bell, it is

respectfully submitted that the obviousness rejection of claim 13 over Bell and Naor is also defective.

Moreover, although Naor teaches encryption by an encryption/decryption unit connected to a telephone, there is no teaching or suggestion in Naor of encrypting or scrambling a stimulus message before *encapsulation* into one or more packets. Therefore, Naor does not provide the requisite suggestion to modify the teachings of Bell to achieve the claimed invention. A *prima facie* case of obviousness has therefore not been established with respect to claim 13 over the cited references.

Independent claim 48 is similarly allowable over Bell and Naor.

Dependent claims are allowable for at least the same reasons as corresponding independent claims. Also, in view of the allowability of base claims over the cited references, it is respectfully submitted that the obviousness rejections of dependent claims have also been overcome.

In view of the foregoing, allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRC.0002US).

Respectfully submitted,

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